

Russell Greer
PO BOX 46602
LAS VEGAS, NV 89114
801-895-3501
russellgreer30business@gmail.com
Pro Se Litigant

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEVADA**

RUSSELL GREER, an individual

Plaintiff

v.

**FREMANTLE PRODUCTIONS NORTH
AMERICA, INC.**, a corporation

Defendant

**PLAINTIFF'S EX PARTE MOTION
FOR ALTERNATIVE SERVICE**

Case No.: 2:21-cv-01905

Judge Richard F. Boulware, II

Magistrate Judge Nancy J. Koppe

Plaintiff files this Motion pursuant to Nevada Rules of Procedure 4.4 and moves for Alternative Service.

FACTS

1. Plaintiff filed this pro se case on October 15th, 2021, alleging disability discrimination under Title III of the ADA.
2. On November 18th, the Court granted the Pauper status of Plaintiff and determined he had stated a claim for discrimination that survived the screening process.
3. In the same Order, Document 10, the Court ordered Plaintiff to provide documents to the U.S. Marshal for service within twenty days.

REQUEST FOR ALTERNATIVE SERVICE

Nevada Rules of Civil Procedure 4.4 allows for alternative service. Greer is not seeking to have alternative service by email or mail or publication, as found in the Nevada statute for alternative service. Rather, Greer would seek to have a private process server serve the registered agent for Fremantle instead of a Marshal. There are a few reasons a private process server would be preferred in the alternative than a U.S. Marshal.

1. PRIVATE PROCESS SERVER IS CHEAPER

According to 28 Code of Federal Regulations 0.114(3), it costs a U.S. Marshal \$65.00 per hour to serve a summons, in addition to .10 cents per page of document to be served, plus gas mileage. This altogether could be upwards of nearly \$100.00.

Greer has found a process server in Glendale, CA that will serve Fremantle's registered agent that is allowed to accept service for just \$30.00.

2. PRIVATE SERVICE IS QUICKER

As stated in Greer's Complaint and Motion for Preliminary Injunction, he is hoping for an injunction before April 2022. The United States Marshal may be slower in serving summons due to possible case load. Also, the Marshal requires payments by check or cash. A private

server accepts payment by card. So the service would be faster and would not need to wait for payment to process.

CONCLUSION

Plaintiff has shown why he should be allowed to have the summons served by private process server instead of by a U.S. Marshal. Plaintiff kindly requests that this Motion be granted.

Respectfully

DATED: November 23rd, 2021

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to be 'R Greer', with a long horizontal stroke extending to the right.

Russell Greer